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April 5, 2019

BYECF AND ELECTRONIC MAIL

The Hon. Cathy Seibel
United States District Judge
United States District Court
for the Southern District of New York
300 Quarropas St.
White Plains, NY 10601-4150

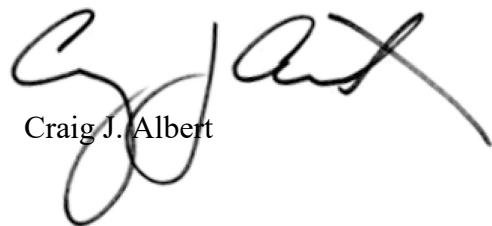
Re: Berger v. Imagina Consulting (18 Civ. 8956 (CS)(JCM))

Dear Judge Seibel:

I represent the defendant Imagina Consulting Inc. in this action.

I write pursuant to the Court's Individual Practices and Local Civil Rule 37.2 to request that the Court conduct an informal conference in advance of my making a motion for discovery sanctions under FRCP 37.

Respectfully submitted,


Craig J. Albert

Copy to Richard Liebowitz, Esq. (via ECF and email)